

NEW YORK *
10 PAERDEGAT 9TH STREET
BROOKLYN, NEW YORK 11236

HOUSTON *
12803 WEDGEWOOD PARK CT
CYPRESS TX, 77433
* BY APPOINTMENT ONLY

TEL: 718-289-4012
FAX: 718-289-4013
EMAIL: INFO@DORLEUSLAW.COM
WWW.DORLEUSLAW.COM

JOSUE DORLEUS, ESQ., PARTNER
MASOOD SYED, ESQ., OF-COUNSEL
ERIK ANDRIEUX, ESQ., OF-COUNSEL

July 5, 2023

Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312
Chambers of Hon. Judge Steward D. Aaron

Application GRANTED. Plaintiff is excused from
backstop service via WeChat (see 5/6/2023 Order,
ECF No. 19) for good cause shown. SO ORDERED.
Dated: July 6, 2023

Re: Civil Action No.: 1:22 CV-09973-GHW

To The Honorable Court:

In accordance with the Court's June 28, 2023, Order, this letter hereby explains the undersigned's efforts to comply with the Court's May 6, 2023, Order directing that service be effectuated on defendant LYU via WeChat. Considering the efforts detailed herein, the undersigned respectfully ask the court to be excused from serving defendant LYU via WeChat.

Pursuant to the Court's Order, on April 1, 2023, the undersigned attempted to download the WeChat App but was unable to do so because the app required a person who already had the App or a person having and conducting business in China in order to register. Since plaintiff Haoyang Huang has the App, on May 24, 2023, the undersigned contacted Mr. Huang and requested his help to register for the App. Mr. Huang agreed and helped the undersigned register (See Exhibit A).

After downloading and registering an account on the App, the undersigned learned that the only way to communicate with persons who were not friends in his phone's contact list is to send that person a friend request through the app (see Exhibit B). The undersigned requested defendant Lyu's Wechat handle from Mr. Huang to wit: "Fionalys". Thereafter, the undersigned attempted to send defendant Lyu a copy of this Court's order granting alternative service, together with a copy of the Summons and Amended Complaint but was unable to do so because defendant Lyu never accepted the undersigned's friend request to chat. Without being friends on Wechat

with the defendant, it is virtually impossible for the undersigned to chat with defendant Lyu or send her any type of correspondence from the Court.

However, despite this difficulty, the record before the Court shows that defendant Lyu and Vhash were served through their U.S legal counsel Cheyenne Zhang and her law office. In light of this, plaintiff Haoyang Huang and the undersigned respectfully ask that this Court excuse plaintiff from his obligation to serve Lyu via Wechat.

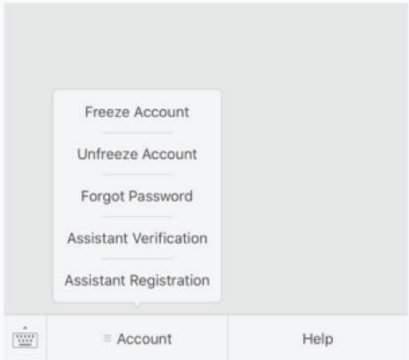
Respectfully Submitted,

DORLEUS LAW PLLC

By: /s/ Josue Dorleus
10 Paerdegat 9th Street
Brooklyn, New York 11236
O: (718) 289-4012
E: Jdorleus@dorleuslaw.com
Attorneys for plaintiff Haoyang Huang

Hi Haoyang, I need your help. I filed a motion to serve Fiona's lawyer and serve her through we chat. The court granted the motion and now I need your help registering for wechat

"Help Friend Register".



3 Ask the user to enter your mobile number.

+1 9173532475

< Back Security check ...

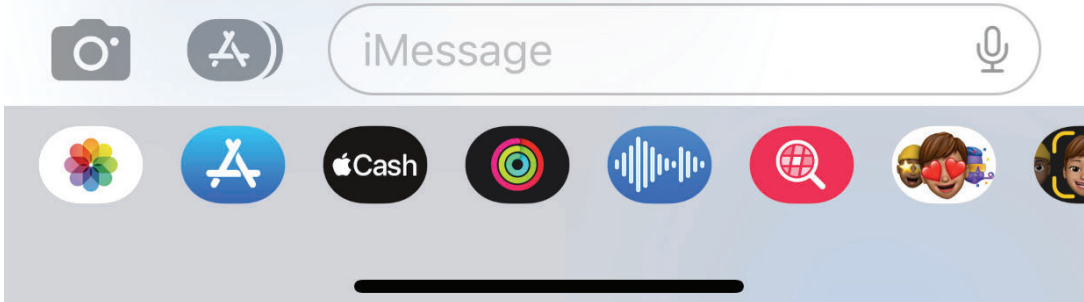
Fill in the mobile number for the friend

+86 Enter a friend's mobile number

Submit

If you do not have the app, let me know if you can have a friend to add me so I can serve her with the court documents

Add my WeChat through phone:



5:58



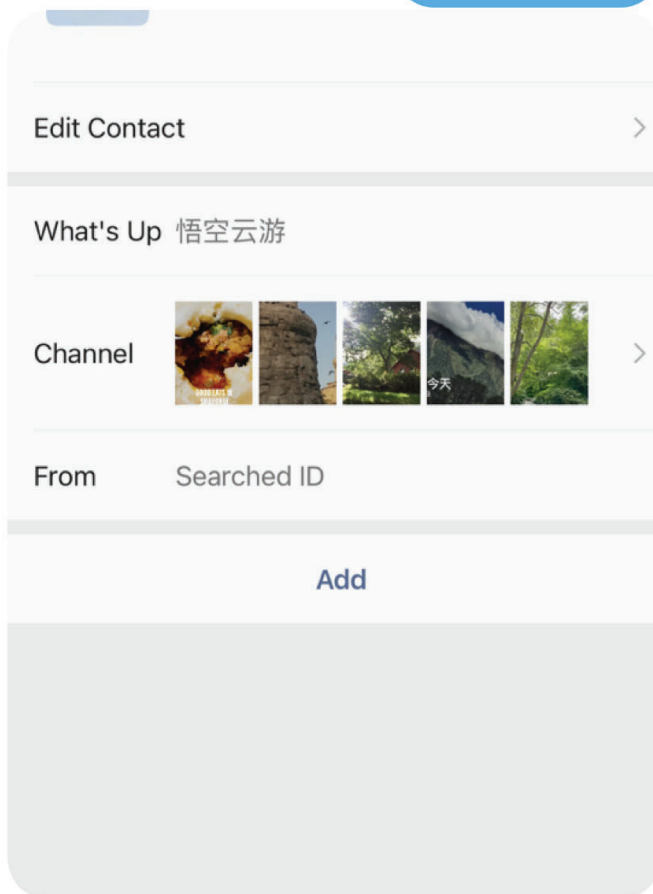
Haoyang (how-yang) H... >



to add her



Ok got her !



So that's her right

Yep

And see her channel, which indicates her most recent activity, should be an active one and no reason she should ignore you.

Active account*



iMessage





火冰

Edit Contact



What's Up 悟空云游

From Searched ID

Add



Send Friend Request

Send Friend Request

I'm Dorleus Law PLLC

Set Alias

火冰

Add tags and a description

Tags



Remark



Set Privacy Settings

Chats, Moments, WeRun, etc.



Chats Only

Moments & Status

Hide My Posts



Hide Their Posts



Send

5:58



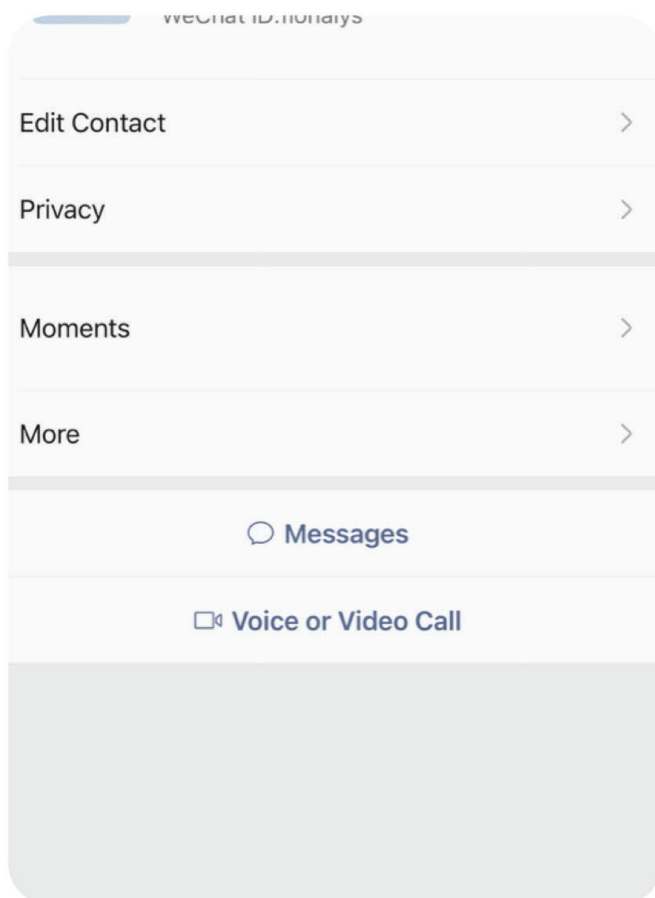
Haoyang (how-yang) H... >



Ok I'm registered. Thank you.
Please send me her handle once
more

Her handle? Or Fiona's wechat
account?

Fiona's WeChat account



Add through her ID

9:10

Contacts



iMessage

